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July 16, 2010

Via ECFS

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, TW-A325  
Washington, D.C. 20554

**Re: Notice of *Ex Parte* Communication  
Petition of Standing Rock Telecommunications, Inc. for Designation as an Eligible  
Telecommunications Carrier, WC Docket No. 09-197**

Dear Ms. Dortch:

On July 14, 2010 Charles Murphy, Chairman of the Standing Rock Sioux Tribe (SRST), Miles McAllister of Standing Rock Telecommunications, Inc (SRTI), and Heather Dawn Thompson, counsel to SRTI, met with the following Commission staff Irene Flannery, Divya Shenoy, and Nicholas Degani of the Wireline Competition Bureau, and Geoff Blackwell of Consumer and Government Affairs.<sup>1</sup> This meeting was followed by a meeting with Chief of Staff Eddie Lazarus.

During the meetings, the Chairman urged the Commission to expeditiously grant ETC Designation to SRTI, as a vitally important component of the financial plan of this first 100% tribally-owned wireless telecommunication company, and as consistent with existing FCC policies to increase communications access in Tribal areas.

The Chairman reiterated that Standing Rock Sioux Tribe's service area and jurisdiction is within the entire reservation boundaries, and the Tribe continues to seek ETC status for the entire reservation in order to service the entire Nation.

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<sup>1</sup> This conversation was a follow up to the written *ex parte* communication of May 12, 2010 by SRTI counsel Doug Bonner, and the *ex parte* of Mel and Madonna Yawakie on June 4, 2010.

However, it was acknowledged that Bureau had authority to make a quicker decision on SRTI's ETC status where there was no redefinition of study area required. As such, the SRST and SRTI agreed to a bifurcation of the ETC designation process. It was agreed that a decision could first be made for those areas in which no redefinition would be required, which would then be followed by the second part of the decision regarding the ETC designation of those areas that would require a redefinition of a study area. Therefore the decision would be bifurcated essentially into a part A and part B, with an initial decision on the portion of the service area not subject to redefinition, to be followed up separately in a subsequent decision on those areas requiring consideration of redefinition.

Chairman Murphy reemphasized that it is time for the Commission to adjust its outdated rules and boundaries in order to respect, consistent with the FCC's own Tribal policy, the Nation's sovereign boundaries and its inherent right to provide services to its entire Nation.

SRST and SRTI emphasized the public policy importance of this ETC designation. The Chairman outlined the historical problems with lack of reliable and affordable communications options throughout the Standing Rock reservation. The designation of SRTI as an ETC would increase consumer choice, improve service quality, substantially increase areas serviced by wireless coverage, and bring all the benefits that come with enhanced competition.

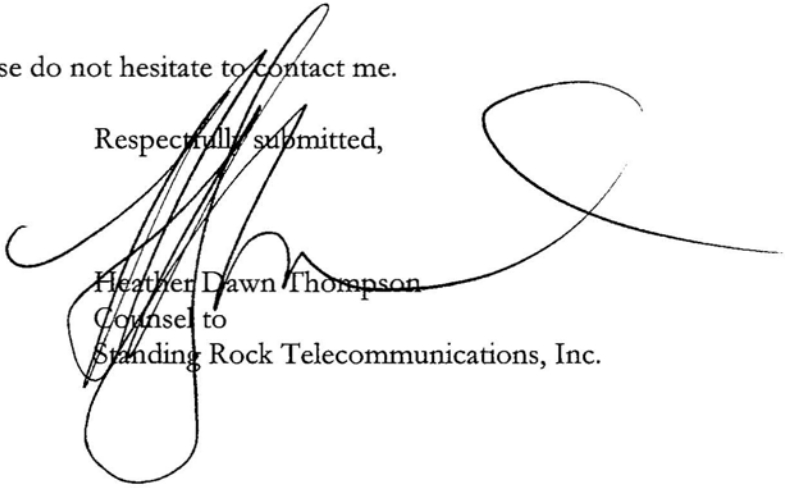
SRST and SRTI went into depth about the enhanced safety benefits. Due to the rural and very isolated nature of the Standing Rock reservation, the low number of public safety officers per square mile, and the harsh weather conditions, historically some deaths and injuries on Standing Rock may have been preventable with a substantial increase in communications coverage. This year during the historic ice storms in which electricity was out for about two weeks with below zero temperature there was virtually no ability to communicate with Tribal members trapped throughout the Nation. The Tribe installed generators and emergency communications, as they were often better able to respond rapidly than either the federal government agencies or the other nearby rural telecommunications providers.

The Chairman also highlighted the key role SRTI will play in the Nation's economic development and preservation of the language and culture. Without reliable communications it is difficult to attract businesses and Tribal members to come home to the Reservation to work, and it is also difficult to support and grow Lakota language and culture classes. The Chairman also highlighted that there were a number of additional education telecommunication grants they would like to apply for, but are unable until they can bring some of the basic infrastructure up to higher standards.

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If you have any questions, please do not hesitate to contact me.

Respectfully submitted,



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Standing Rock Telecommunications, Inc.

cc: Eddie Lazarus  
Irene Flannery  
Divya Shenoy  
Nick Degani  
Geoff Blackwell  
Lauren Kravetz